From: gray.david@epa.gov [gray.david@epa.gov]

**Sent**: 3/24/2019 2:57:39 PM

To: Konkus, John [konkus.john@epa.gov]; Grantham, Nancy [Grantham.Nancy@epa.gov]; Lyons, Troy

[lyons.troy@epa.gov]; Palich, Christian [palich.christian@epa.gov]; Frye, Tony (Robert) [frye.robert@epa.gov]; McFaul, Jessica [mcfaul.jessica@epa.gov]; Abboud, Michael [abboud.michael@epa.gov]; Hewitt, James [hewitt.james@epa.gov]; Schiermeyer, Corry [schiermeyer.corry@epa.gov]; Idsal, Anne [idsal.anne@epa.gov];

Chancellor, Erin [chancellor.erin@epa.gov]

Subject: SUN AM Update-International Terminals Corporation Fire

This will go to the delegation shortly. David

Intercontinental Terminals Company (ITC) Fire Morning Update Deer Park, Texas
March 23, 2019 1200 – March 24, 2019 0400

- The US Environmental Protection Agency (EPA) continues to participate in Unified Command with Texas Commission on Environmental Quality (TCEQ), Harris County Pollution Control Services, and ITC.
- EPA continues to participate in the daily press conferences held at the Incident Command Post.
- At 8:30 on March 23, 2019, EPA delivered an Administrative Order under Section 311 of the Clean Water Act to ITC. This Order requires ITC to conduct actions to abate or mitigate an imminent and substantial threat to the public health or welfare by the discharge or substantial threat of a discharge of hazardous substances from the above listed facility into or upon the navigable waters or adjoining shorelines.
- ITC began pumping of Tank 80-7 at approximately 3:00 pm on March 23, 2019. It was expected to take approximately 10-12 hours to completely pump the tank to empty. At approximately 2:00 am on March 24, 2019, pumping ceased due to a pump issue. ITC will try to remedy the problem after daybreak on March 24, 2019. Approximately 12,000 barrels (bbl) of the 20,000 bbl in the tank have been removed.
- On March 24, 2019, ITC continues foaming of Tank 80-7, as well as the secondary containment.
- On March 23, 2019, ITC removed liquids out of the secondary containment down to approximately 1 inch in depth. A layer of foam is being maintained upon the remaining liquid.
- ITC is preparing to address and remove the remaining product (Py Gas) in Tanks 80-14 and 80-15 on Sunday, March 24, 2019.
- ITC estimates that approximately 2,200 bbl of water/product have been removed from Tucker Bayou in the last 24 hours by 11 vacuum trucks. The Admiral recovery ship is stationed close to the Battleship, but is not finding any recoverable product at this time.
- EPA conducted surface water samples on March 23, 2019 at eight locations. Five sample locations were along Buffalo Bayou and three locations were along the San Jacinto River. Results from previous sampling events in Tucker Bayou on March 20, 2019 and in Buffalo Bayou on March 21, 2019, found exceedances of the Texas Commission on Environmental Quality (TCEQ) water quality levels for benzene and xylene in Tucker Bayou and at the confluence of Tucker Bayou and Buffalo Bayou. In addition, naphthalene, ethylbenzene, methyl tert-butyl ether (MTBE) and toluene exceeded the TCEQ levels in the Tucker Bayou sample. EPA will continue to sample surface water near the ITC site.

- The Airborne Spectral Photometric Environmental Collection Technology (ASPECT) aircraft found no exceedances of the Texas comparison values on March 23, 2019 during Flight 10. ASPECT has conducted a screening level assessment to evaluate the unreported or undetected releases of hazardous materials or contaminants at ITC in Deer Park, Texas. The screening level results from ASPECT were compared to the ASPECT list of TCEQ short-term Air Monitoring Comparison Values (AMCVs) and found no exceedances of the short-term AMCVs.
- EPA conducted air sampling using the Trace Atmospheric Gas Analyzer (TAGA) on March 23, 2019. The TAGA analyzed the air samples for benzene, toluene and xylene. The TAGA air sampling results were compared to the TCEQ short-term AMCVs and found no exceedances of the short-term AMCVs for toluene and xylene. The TAGA air sampling results found exceedances of the short-term AMCV for benzene (0.18 parts per million (ppm)). These exceedances of the short-term AMCV for benzene were north of Buffalo Bayou and northwest of the ITC site, and have been shared with unified command and local officials.
- EPA conducted handheld air monitoring from March 23, 2019 (12:00 pm) to March 24, 2019 (04:00 am) at 48 locations. Results were reported above the detection limit at two locations for total VOCs and at the same locations for benzene. Benzene was detected above the TCEQ short-term AMCV (0.18 ppm). EPA will conduct additional air monitoring and deploy the TAGA to determine if the short-term AMCV for benzene continues to be exceeded.
- Several entities including Harris County, TCEQ, EPA, the 6th Civil Support Team, and ITC continue to conduct air monitoring around the tank farm, in adjoining industrial areas, and communities downwind from the facility.
- ITC continued air monitoring on March 23, 2019; there were 1,591 VOCs readings and 1,442 benzene readings. There continues to be readings above the action levels for benzene(0.18 ppm) close to the tank farm on Tidal Road and by Dock 4 on Buffalo Bayou. There were a few detections for benzeneover 1.0 ppm in the community downwind (Channelview area) but none were sustained for any period.
- TCEQ continued handheld air monitoring between 2:00 pm and 10:00 pm on March 23, 2019; there were 15 benzene readings with no detected values.
- On March 23, 2019, Unified Command developed, reviewed, and approved the Incident Action Plan (#2) for the next operational period.
- On March 23, 2019, Unified Command developed, reviewed, and approved a decontamination plan for vessels that may have been oiled in Buffalo Bayou. The plan requires ITC to follow the RRT preauthorization issued for the area and the procedures contained within the Area Contingency Plan (ACP) maintained by the United States Coast Guard.
- The Rapid Assessment Team (RAT) is scheduled to continue visual assessments and document impact along the Bayou shorelines on March 24.
- On March 23, 2019, ITC has secured two 30,000 bbl barges for disposal purposes.
- TCEQ Austin is currently reviewing the ITC Waste Management Plan.



Sent from my iPhone